

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES)	
)	
V.)	No. 04-cr-10194-RCL
)	
ANTHONY BUCCI)	
_____)	

**DEFENDANT’S MOTION FOR LEAVE TO FILE REPLIES TO
GOVERNMENT’S MISLEADING OPPOSITIONS TO REQUESTS
FOR SEVERENCE, SUPPRESSION AND THE MIRANDA FORM**

Now comes the defendant, in the above-entitled matter, and moves this Honorable Court for leave to file replies to the government’s factually inaccurate and misleading oppositions to pending motions for severance of Count Five, suppression of the defendant’s statements elicited after his invoking his right to counsel and for a copy of the Miranda form he signed at the time he invoked his right to counsel, pursuant to D. Mass. Local Rule 7.1(B)(3).

In support of this motion the defendant files his affidavit supporting the pending severance motion. These, and other, material facts known to the United States Attorney’s Office but omitted from their misleading oppositions, shall be fully developed at the evidentiary hearing on the pending motion to suppress and counsel suggests the three replies filed herewith are necessary to full and fair adjudication of the violations of the defendant’s Constitutional rights.

Anthony Bucci
By his attorney,

/s/Michael F. Natola

March 7, 2005

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing affidavit has been served the above date, electronically, upon Assistant U.S. Attorney John T. McNeil.

/s/ Michael F. Natola

MICHAEL F. NATOLA